REMARKS

I.   Summary of Office Action

Claims 1-79 were pending in the above-identified application.

Claims 1, 2, 4-5, 7, 18-22, 24-25, 27, 38-42, 44-45, 47, 58-62, 64-65, 67, and 78-79 were rejected under 35 U.S.C. § 102(e) as being anticipated by Shah-Nazaroff et al. (U.S. Patent No. 6,157,377).

Claims 3, 23, 43, and 63 were rejected under 35 U.S.C § 103(a) as being unpatentable over Shah-Nazaroff et al. in view of Hofmann (U.S. Patent No. 5,883,677).

Claims 6, 26, 46, and 66 were rejected under 35 U.S.C § 103(a) as being unpatentable over Shah-Nazaroff et al. in view of Matthews, III (U.S. Patent No. 5,815,145).

Claims 8, 9, 13, 28, 29, 33, 48, 49, 53, 68, 69, and 73 were rejected under 35 U.S.C § 103(a) as being unpatentable over Shah-Nazaroff et al. in view of Banker (U.S. Patent No. 5,485,221).

Claims 10, 30, 50, and 70 were rejected under 35 U.S.C § 103(a) as being unpatentable over Shah-Nazaroff et al. in view of Lett (U.S. Patent No. 5,771,064).

Claims 11, 12, 31, 32, 51, 52, 71, and 72 were rejected under 35 U.S.C § 103(a) as being unpatentable over Shah-Nazaroff et al. in view of Lewis (U.S. Patent Application No. 2003/0040962).

Claims 14, 15, 34, 35, 54, 55, 74, and 75 were rejected under 35 U.S.C § 103(a) as being unpatentable over Shah-Nazaroff et al. in view of Aristides (U.S. Patent No. 5,630,119).

Claims 16, 36, 56, and 76 were rejected under 35 U.S.C § 103(a) as being unpatentable over Shah-Nazaroff et al. in view of Rosin (U.S. Patent No. 6,028,600).

Claims 17, 37, 57, and 77 were rejected under 35 U.S.C § 103(a) as being unpatentable over Shah-Nazaroff et al. in view of Hooper (U.S. Patent No. 5,414,455).

II.   Summary of Applicant's Reply

Applicants have amended independent claims 1, 21, 41, and 61 to incorporate the subject matter of dependent claims 17, 37, 57, and 76 and to more particularly define the claimed invention. Accordingly, applicants have cancelled dependent claims 17, 37, 57, and 76. Applicants have also amended claims 14, 31-36, 38-40, 51-56, 58-60, and 73, and added new claims 80-83. No new matter has been added, and the amendments to the claims and the new claims are fully supported by the specification.

Applicants respectfully request reconsideration and allowance of this application in light of the amendments to the claims and the remarks that follow.

III.   Applicants' Response to the Rejection of
         Independent Claims 1, 21, 41, and 61

Applicant's invention, as recited in independent claims 1, 21, 41, and 61, is directed to a method, systems, and computer-readable media for receiving on-demand media data and non-on-demand data for use by an interactive television application system, where the on-demand media and the non-on-demand media data are provided from separate sources. A client-server connection is automatically established between the interactive television application system and an on-demand media data source. The on-demand media data is automatically retrieved from the on-demand media data source, and is automatically cached. The cached on-demand data is displayed

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to a user in response to a user indication to access at least
the on-demand media data.

In the Office Action, the Examiner maintains his
rejection of previously pending independent claims 1, 21, 41,
and 61 under § 102 as being anticipated by Shah-Nazaroff et
al. For at least the reasons specified in applicants' Reply
to Office Action filed January 25, 2007, applicants
respectfully disagree with the Examiner's contention that
Shah-Nazaroff et al. shows all of the features of applicants'
independent claims. However, in the interest of advancing
prosecution, applicants have amended independent claims to
include the element of automatically establishing a client-
server connection between the interactive television
application system and the on-demand media data source. This
element is similar to that specified by applicants' previously
pending claims 17, 37, 57, and 76, which was rejected as being
unpatentable over Shah-Nazaroff et al. in view of Hooper.

Hooper refers to a system for distributing videos to
a viewing device on-demand. The system includes a memory
buffer that stores a predetermined time interval of the video.
The memory buffer is associated with a write pointer and a
read pointer for independently writing and reading from the
memory buffer. The video segment at the location specified by
the read pointer is read and transferred to the video device
for display (abstract).

On page 12 of the Office Action, the Examiner admits
that Shah-Nazaroff "fails to disclose establishing a
connection between the interactive television application
system and the on-demand media data source," and relies solely
on Hooper to show this feature. In support of his contention,
the Examiner cites to the abstract, FIG. 12, and col. 15,
lines 43-47 of Hooper. Applicants respectfully submit that,

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contrary to the Examiner's contention, Hooper does not show this feature of applicants' independent claims for at least the following two reasons.

    1.   <u>Hooper fails to show an on-demand media data source</u>

       First, applicants respectfully submit that Hooper does not distribute on-demand media data, and therefore cannot show that a connection is established for an "on-demand media data source," as required by applicants' claim element. As stated in applicants' specification, on-demand media "may be any suitable media that is provided to users in response to user requests," such as on-demand videos, on-demand audio, or downloadable software (applicants' specification at p. 3, ll. 29-31). On-demand media data "may be any data which describes the [on-demand] media or is associated with the [on-demand] media (applicants' specification at p. 3, l. 31 through p. 4, l. 2).

       The sections of Hooper cited by the Examiner refer to a "system for distributing videos" (abstract) and ways in which a cache controller of the system "manag[es] the delivering of the video" (col. 15, ll. 41-42). As defined in Hooper, these videos collectively refer to movies, sporting events, interactive games, home shopping, textual information, and educational and arts (col. 1, ll. 10-15). Therefore, at best, Hooper shows a source for providing on-demand media, but not a source for providing on-demand media data.

       Applicants believe the Examiner may have considered Hooper's reference to "video data" in the abstract to read on applicants' claimed "on-demand media data." However, Hooper specifies that the memory buffer (in which the video data is stored) is used for storing a segment of the video (abstract), and that the video data is converted to video signals by a

decoder/decompressor for display (col. 14, ll. 48-58). Thus,
taken in context, Hooper's video data refers to a
representation of the video itself (such as a binary
representation), not to data describing the video or to data
associated with the video.

For at least the reason that Hooper fails to show an
on-demand media data source, as required by applicants'
independent claims, applicants respectfully submit that
independent claims 1, 21, 41, and 61 are patentable over Shah-
Nazaroff and Hooper.

2.   Hooper fails to show automatically
      establishing a client-server connection

Even assuming that Hooper discloses an on-demand
media data source, which it does not, Hooper still fails to
show that a client-server connection between an interactive
television application system and the on-demand media data
source is established <u>automatically</u>.

Instead, Hooper specifies that "the connection can
be made by pressing one or more buttons on the video
controller" (col. 7, l. 65 through col. 8, l. 7). Therefore,
contrary to applicants' technique of automatically
establishing a connection, Hooper teaches a technique that
requires user initiation. Nowhere does Hooper show or suggest
that the connection can be established automatically.

In view of the foregoing, applicants respectfully
submit that Hooper fails to show or suggest automatically
establishing a client-server connection between an interactive
television application system and an on-demand media data
source. Therefore, Shah-Nazaroff and Hooper, taken
individually or in combination, fail to show or suggest this
claim element. For at least this reason, applicants

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respectfully submit that independent claims 1, 21, 41, and 61 are allowable over Shah-Nazaroff and Hooper.

IV.   Applicants' Response to the Rejection of
       the Dependent Claims

The Examiner rejected claims 2, 4, 5, 7, 18-20, 22, 24, 25, 27, 38-40, 42, 44, 45, 47, 58-60, 62, 64, 65, 67, and 78-79 under 35 U.S.C 102(e) as being anticipated by Shah-Nazaroff. Applicant respectfully disagrees. In view of the amendments to the claims and the remarks with respect to independent claims 1, 21, 41, and 61, Shah-Nazaroff does not teach or suggest all of the elements of independent claims 1, 21, 41, and 61. Therefore, because claims 2, 4, 5, 7, 18-20, 22, 24, 25, 27, 38-40, 42, 44, 45, 47, 58-60, 62, 64, 65, 67, and 78-79 depend from and are limited by independent claims 1, 21, 41, and 61, the § 102 Rejection of claims 2, 4, 5, 7, 18-20, 22, 24, 25, 27, 38-40, 42, 44, 45, 47, 58-60, 62, 64, 65, 67, and 78-79 should be withdrawn.

The Examiner rejected claims 3, 23, 43, and 63 under 35 U.S.C 103(a) as being unpatentable over Shah-Nazaroff et al. in view of Hofmann. Applicant respectfully disagrees. In view of the amendments to the claims and the remarks with respect to independent claims 1, 21, 41, and 61, the combination of Shah-Nazaroff and Hofmann does not teach or suggest all of the elements of independent claims 1, 21, 41, and 61. Therefore, because claims 3, 23, 43, and 63, depend from and are limited by independent claims 1, 21, 41, and 61, the § 103 Rejection of claims 3, 23, 43, and 63 should be withdrawn.

The Examiner rejected claims 6, 26, 46, and 66 under 35 U.S.C 103(a) as being unpatentable over Shah-Nazaroff et

al. in view of Matthews. Applicant respectfully disagrees.
In view of the amendments to the claims and the remarks with
respect to independent claims 1, 21, 41, and 61, the
combination of Shah-Nazaroff and Matthews does not teach or
suggest all of the elements of independent claims 1, 21, 41,
and 61. Therefore, because claims 6, 26, 46, and 66, depend
from and are limited by independent claims 1, 21, 41, and 61,
the § 103 Rejection of claims 6, 26, 46, and 66 should be
withdrawn.

The Examiner rejected claims 8, 9, 13, 28, 29, 33,
48, 49, 53, 68, 69, and 73 under 35 U.S.C 103(a) as being
unpatentable over Shah-Nazaroff et al. in view of Banker.
Applicant respectfully disagrees. In view of the amendments
to the claims and the remarks with respect to independent
claims 1, 21, 41, and 61, the combination of Shah-Nazaroff and
Banker does not teach or suggest all of the elements of
independent claims 1, 21, 41, and 61. Therefore, because
claims 8, 9, 13, 28, 29, 33, 48, 49, 53, 68, 69, and 73,
depend from and are limited by independent claims 1, 21, 41,
and 61, the § 103 Rejection of claims 8, 9, 13, 28, 29, 33,
48, 49, 53, 68, 69, and 73 should be withdrawn.

The Examiner rejected claims 10, 30, 50, and 70
under 35 U.S.C 103(a) as being unpatentable over Shah-Nazaroff
et al. in view of Lett. Applicant respectfully disagrees. In
view of the amendments to the claims and the remarks with
respect to independent claims 1, 21, 41, and 61, the
combination of Shah-Nazaroff and Lett does not teach or
suggest all of the elements of independent claims 1, 21, 41,
and 61. Therefore, because claims 10, 30, 50, and 70, depend
from and are limited by independent claims 1, 21, 41, and 61,
the § 103 Rejection of claims 10, 30, 50, and 70 should be
withdrawn.

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The Examiner rejected claims 11, 12, 31, 32, 51, 52, 71, and 72 under 35 U.S.C 103(a) as being unpatentable over Shah-Nazaroff et al. in view of Lewis. Applicant respectfully disagrees. In view of the amendments to the claims and the remarks with respect to independent claims 1, 21, 41, and 61, the combination of Shah-Nazaroff and Lewis does not teach or suggest all of the elements of independent claims 1, 21, 41, and 61. Therefore, because claims 11, 12, 31, 32, 51, 52, 71, and 72, depend from and are limited by independent claims 1, 21, 41, and 61, the § 103 Rejection of claims 11, 12, 31, 32, 51, 52, 71, and 72 should be withdrawn.

The Examiner rejected claims 14, 15, 34, 35, 54, 55, 74, and 75 under 35 U.S.C 103(a) as being unpatentable over Shah-Nazaroff et al. in view of Aristides. Applicant respectfully disagrees. In view of the amendments to the claims and the remarks with respect to independent claims 1, 21, 41, and 61, the combination of Shah-Nazaroff and Aristides does not teach or suggest all of the elements of independent claims 1, 21, 41, and 61. Therefore, because claims 14, 15, 34, 35, 54, 55, 74, and 75, depend from and are limited by independent claims 1, 21, 41, and 61, the § 103 Rejection of claims 14, 15, 34, 35, 54, 55, 74, and 75 should be withdrawn.

The Examiner rejected claims 16, 36, 56, and 76 under 35 U.S.C 103(a) as being unpatentable over Shah-Nazaroff et al. in view of Rosin. Applicant respectfully disagrees. In view of the amendments to the claims and the remarks with respect to independent claims 1, 21, 41, and 61, the combination of Shah-Nazaroff and Rosin does not teach or suggest all of the elements of independent claims 1, 21, 41, and 61. Therefore, because claims 16, 36, 56, and 76, depend from and are limited by independent claims 1, 21, 41, and 61,

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the § 103 Rejection of claims 16, 36, 56, and 76 should be withdrawn.

V.   New Claims 80-83

Applicants have added new claims 80-83, which depend respectively from independent claims 1, 21, 41, and 61. Applicants have shown above that the independent claims are allowable. Therefore, because new claims 80-83 depend from and are limited by allowable independent claims 1, 21, 41, and 61, new claims 80-83 should also be found allowable.

VI.   Conclusion

Applicant respectfully submits that this application is in condition for allowance. Reconsideration in light of the foregoing amendment and remarks are respectfully requested.

Respectfully submitted,

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